

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
CROWN CLOTHING CORPORATION,)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO. 05-10049 (NG)
)	
RANDCORE, INC.,)	
RAND INTERNATIONAL TRADING,)	
INC., ANDRE BERNARD, AND)	
RONALD BERNARD,)	
Defendants.)	
_____)	

**JOINT MOTION TO EXTEND
DISCOVERY SCHEDULE DEADLINES**

The plaintiff Crown Clothing Corporation and remaining defendant Ronald Bernard jointly move to extend the following deadlines contained in the parties' Revised Joint Statement and Pretrial Schedule filed on May 24, 2005 (the "Joint Statement"):

- A. Fact Discovery: Extended from October 1, 2006 to October 31, 2006;
- B. Plaintiff's Expert Reports: Extended from October 16, 2006 to November 17, 2006, and;
- C. Defendant's Expert Reports: Extended from November 17, 2006 to December 15, 2006.

In support of this Motion, the parties state that due to, *inter alia*, the travel plans and vacations of the two witnesses that the plaintiff intends to conduct depositions, the parties have not been able to schedule depositions for these witnesses during the month of August or September. The depositions of the two witnesses are currently scheduled for the first two weeks in October. Accordingly, in order to allow sufficient time for discovery after the

completion of those two depositions during the first two weeks of October, the parties request that this Court enter an order extending the deadline to complete fact discovery by thirty (30) days to October 31, 2006. The parties also request similar thirty (30) day extensions for the deadlines to complete service of expert reports to allow the parties to complete factual discovery before expert designations begin. The parties are not requesting any extension of time for the other deadlines in the Joint Statement and believe that the requested extensions will not prolong the case beyond its current schedule.

Respectfully submitted,

/s/ John C. Wyman

John C. Wyman (BBO #535620)
Ryan M. MacDonald (BBO #654688)
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, MA 02110
(617) 457-4000
jcwyma@murthlaw.com
rmacdonald@murthalaw.com

Attorneys for Plaintiff Crown
Clothing Corporation

Dated: September 27, 2006

/s/ Gary R. Greenberg

Gary R. Greenberg (BBO #209420)
Annapoorni R. Sankaran (BBO#631065)
James M. Vant (BBO #653616)
Greenberg Traurig, LLP
One International Place
Boston, MA 02110
(617) 310-6000
greenbergg@gtlaw.com
vantj@gtlaw.com

Attorneys for Defendant Ronald Bernard